

EXHIBIT K

From: Carlisle, Marie L. <mcarlisle@bakerlaw.com>
Sent: Friday, August 26, 2016 6:29 PM
To: Helen Chaitman; Jennifer Allim
Cc: Smith, Rachel M.; Hunt, Dean D.
Subject: RE: Adv. Pro. No. 10-04728, Picard v. DiGiulian

Helen,

As Ms. DiGiulian provided amended discovery responses this week, we will review them and respond to your email next week. We ask that you please have Ms. DiGiulian hold the November date she previously provided.

Thanks,

Marie

From: Helen Chaitman [mailto:hchaitman@chaitmanllp.com]
Sent: Wednesday, August 24, 2016 2:34 PM
To: Carlisle, Marie L.; Jennifer Allim
Cc: Smith, Rachel M.; Hunt, Dean D.
Subject: RE: Adv. Pro. No. 10-04728, Picard v. DiGiulian

You haven't answered my question: what information are you seeking to obtain from her? As I explained, her deceased husband handled the account, which was his account. While she is his surviving widow, she has no first hand knowledge of the account. I intend to move for a protective order and I would like to know what areas you seek to question her about.

Helen Davis Chaitman
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From: Carlisle, Marie L. [mailto:mcarlisle@bakerlaw.com]
Sent: Wednesday, August 24, 2016 3:02 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>; Jennifer Allim <jallim@chaitmanllp.com>
Cc: Smith, Rachel M. <rsmith@bakerlaw.com>; Hunt, Dean D. <dhunt@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10-04728, Picard v. DiGiulian

Helen,

On August 19, Ms. Allim emailed me stating that Ms. DiGiulian has agreed to travel to New York for her deposition, to occur on November 15, 2016. Thus, I noticed the deposition for that date.

As to Ms. DiGiulian's knowledge, she executed the verification for the original responses to written discovery, as well as the amended responses served yesterday. She appears to be the person with the most knowledge and we intend to depose her on the date she offered.

Marie

From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Tuesday, August 23, 2016 5:27 PM
To: Carlisle, Marie L.; Jennifer Allim
Cc: Smith, Rachel M.; Hunt, Dean D.
Subject: RE: Adv. Pro. No. 10-04728, Picard v. DiGiulian

Marie: Can you let me know why you feel it is necessary to depose Mrs. DiGiulian. She is in her '80's; is not well; had nothing to do with her husband's account; and has no personal knowledge about it. If there were really an issue of fact that she could elucidate, I could understand your need to seriously inconvenience her. But is there such an issue?

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From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]
Sent: Tuesday, August 23, 2016 6:10 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>; Jennifer Allim <jallim@chaitmanllp.com>
Cc: Smith, Rachel M. <rsmith@bakerlaw.com>; Hunt, Dean D. <dhunt@bakerlaw.com>
Subject: Adv. Pro. No. 10-04728, Picard v. DiGiulian

Counsel,

Attached please find correspondence regarding Ms. DiGiulian's deposition in the above referenced adversary proceeding. A hard copy has also been sent to Ms. Chaitman's attention.

Thanks,

Marie

Marie Carlisle
Partner

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